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Attorneys for Defendant ActiveProspect, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

Loretta Williams, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

**What If Holdings, LLC d/b/a C4R Media
Corp., and ActiveProspect, Inc.,**

Defendants.

Case No. 3:22-cv-03780-WHA

[Assigned to Hon. William Alsup]

**JOINT STIPULATION TO EXTEND TIME
TO RESPOND TO COMPLAINT**

Action Filed: June 27, 2022

Current Response Date: August 29, 2022

New Response Date: September 12, 2022

RECITALS

1. On or about June 27, 2022, Plaintiff Loretta Williams. (“Plaintiff”) filed the Complaint.

2. ActiveProspect agreed to a waiver of the service of summons (the “Waiver”), which was filed on July 15, 2022. Waiver, ECF No. 15.

3. Pursuant to the Waiver, ActiveProspect’s original deadline to answer or otherwise respond to the Complaint is August 29, 2022.

4. Pursuant to Local Rule 6-1(a) of the United States District Court for the Northern District of California, Plaintiff and ActiveProspect agree to extend the time for ActiveProspect to answer or otherwise respond to the Complaint to and including September 12, 2022.

5. The change will not alter the date of any event or any deadline already fixed by Court order.

6. Plaintiff and ActiveProspect further agree that ActiveProspect has not waived its right to file a motion to transfer pursuant to 28 U.S.C. § 1404(a) or a pre-answer motion, including a motion to dismiss for failure to state a claim pursuant to Rule 12(b)(1) or 12(b)(6).

STIPULATION

Plaintiff and ActiveProspect, by and through their respective counsel, hereby stipulate and agree as follows:

1. The time within which ActiveProspect must answer or otherwise respond to the Complaint shall be extended to and including September 12, 2022.

1 DATED: August 25, 2022

2
3 /s/ Rebecca Davis

Rebecca Davis (SBN 271662)

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/s/ Becca J. Wahlquist

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Attorneys for Defendant ActiveProspect, Inc.

14 *Attorneys for Plaintiff Loretta Williams*

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17 Pursuant to Local Rule 5-1(h)(3), I attest that all other signatories listed, and on whose
18 behalf the filing is submitted, concur in the filing of this stipulation and have authorized the filing
19 of this stipulation.
20

21 DATED: August 25, 2022

22 Respectfully submitted,

23 /s/ Becca J. Wahlquist

24 Becca J. Wahlquist (SBN 215948)

CERTIFICATE OF SERVICE

I hereby certify that, on August 25, 2022, I electronically filed the foregoing JOINT STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT with the United States District Court for the Northern District of California by using the CM/ECF system, which will send a notice of filing to all registered users, including counsel for all parties.

DATED: August 25, 2022

Respectfully submitted,

/s/ Becca J. Wahlquist

Becca J. Wahlquist (SBN 215948)